



**RE: OF 18 decision**

**TARNOW Karen E** to: Carl Stivers, Amanda Shellenberger,  
Kristine Koch

02/12/2007 01:30 PM

Cc: Andy Koulermos, dawn, Dennis Hanzlick, LindaSC, ljones, Shawn  
Hinz, Simon Page

I'm sitting here with Kristine and we both feel it is better to sample this location than not. If we have to throw the data out in the end, so be it. But might as well give it a try.

Karen

-----Original Message-----

From: Carl Stivers [mailto:cstivers@anchorenv.com]  
Sent: Monday, February 12, 2007 12:45 PM  
To: Amanda Shellenberger;  
Koch.Kristine@epamail.epa.gov  
Cc: Andy Koulermos; dawn@bes.ci.portland.or.us;  
Dennis Hanzlick;  
LindaSC@BES.CI.PORTLAND.OR.US;  
ljones@integral-corp.com; Shawn Hinz;  
Simon Page; TARNOW Karen E  
Subject: OF 18 decision

Stormwater Tech Team -

In addition, to the OSM location issue, I wanted to get back to everyone about the status of OF18 location. We did the recon. and obtained information from the City on the invert elevations of various OF18 manholes. The result is that like some of the other City basins, we have to go upstream within the system a certain distance before we get to elevations that start to be feasible from a potential river backup perspective.

The attached map shows the locations of potential manholes for sampling and the list below gives their approximate COP datum elevations.

AMZ094 - 12.5' (at Gunderson parking lot)

AMZ093 - 12.9' (RR yard)

AMZ092 - 13.1' (RR yard)

AMZ089 - 13.3' (RR yard)

AMZ088 - 13.4' (RR yard)

AMZ087 - 13.4'

AMZ095 - 14.5 (NW Yeon)

By the time we get up to AMZ095 we still have a drainage area that includes a considerable amount of industrial/light industrial and open space usage. Once we go above there we are cutting out large chunks of the industrial drainage, which would seem to run counter to the objective for this station.

If you compare the elevation at AMZ095 (with correction) to the river gauge statistics in Table 4-1 of the FSP, you can see that there is a relatively high chance that this location could be inundated with river water at some time during the three month deployment period. Consequently, I would suggest the two following potential decisions:

1. Don't sample OF18 due to the risk of inundation and don't look for a replacement location. The reason for not looking for a replacement is two fold: (1) OF18 is already a replacement for OF17 and during our Jan. 31 meeting discussions we were running out of candidate locations for large multiple use basins to sample. Thus, I am not sure where else we would propose at this point. (2) We are far enough into the recon and mobilization stage that we are really running out of time to find, understand, and pick any new locations. We need to be installing equipment now, not looking for sites.

2. Sample OF18 at AMZ095 and try to manage the risk of inundation effects by closely monitoring the river levels during trap and water sampling activities limit the potential for impacts. Thus, we would not conduct water sampling at this site during storm conditions that were coincident with higher river levels. Similarly, we would pull sediment trap bottles if it looked like the river was coming up to unacceptable levels. Even with these management approaches, there is still some risk that we might miss a quick change in the river elevations and have an "impacted" sample results.

Let me know if you have a preference for one of these two approaches or any other suggested path forward. We need to make a decision on this and OSM this week, so that we can be ready to install equipment next week.

Thanks.

Carl

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-----Original Message-----

From: Amanda Shellenberger  
Sent: Monday, February 12, 2007 8:49 AM  
To: Carl Stivers; 'Koch.Kristine@epamail.epa.gov'  
Cc: 'Andy Koulermos'; 'dawns@bes.ci.portland.or.us';  
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Subject: RE: Portland Harbor RI/FS Stormwater FSP for  
EPA/LWG Approval

Team--

Here is my understanding of the current status of the Oregon Steel Mills Basins, per Merv Coover from Retec:

Outfall 001 receives a significant portion of total flow (approx. 20% from an area equipped with a Vortech and Stormfilter

in a series configuration (Basin D). This equipment was installed early in 2006. Also, this outfall discharges an appreciable amount of groundwater year round due to infiltration into damaged sections of pipe. OSM is looking into the feasibility of repairing the pipe and eliminating the groundwater infiltration. This work would occur summer 2007 at the earliest. I expect that one would need to consider the existing groundwater infiltration and factor it into any sampling and data interpretation scheme.

Outfall 002 drains to the City-owned storm sewer in Ramsey Blvd. south of the plant. This water ultimately discharges to the river at Outfall 053A. OSM's recent plant expansion work in the basins (D, G and I) draining to this outfall resulted in significant storm water source control consisting of infrastructure and BMP upgrades.

There is a Vortech hydrodynamic separator on the main trunk line leading to Outfall 003. This device does little more than remove grit and floatable debris. While this is technically "treatment", it has no effect on dissolved constituents. Further, the solids removal capability of the device is limited to large grain sizes which are generally not expected to carry the majority of sorbed organic constituents anyway. OSM has been working with DEQ to implement a phased source control program which, in part, involves routing storm water runoff from Basins A and E through a gravity settling basin prior to discharge at Outfall 003. Plans call for having the settling basin on-line this winter.

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-----Original Message-----

From: Carl Stivers  
Sent: Monday, February 12, 2007 8:16 AM  
To: Koch.Kristine@epamail.epa.gov  
Cc: Andy Koulermos; Amanda Shellenberger; dawns@bes.ci.portland.or.us; Dennis Hanzlick; LindaSC@BES.CI.PORTLAND.OR.US; ljones@integral-corp.com; Shawn Hinz; Simon Page; TARNOW Karen E; blischke.eric@epa.gov; humphrey.chip@epamail.epa.gov  
Subject: RE: Portland Harbor RI/FS Stormwater FSP for EPA/LWG Approval

Kristine -

I agree that you have identified the range of options. I think option 3 is a substantial departure from what we would be doing at other sites, so I am not in favor of that one. The others I am pretty non-biased about and would seek input from the Technical Team on preferences. However, before you vote, Amanda Shellenberger is developing some information in response to Karen's questions on the OSM outfalls. Take a look at that first when it comes out and then let me know what your preferences are. Thanks.

Carl

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-----Original Message-----

From: Koch.Kristine@epamail.epa.gov  
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Subject: RE: Portland Harbor RI/FS Stormwater FSP for  
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Carl - The purpose of this years data is to correlate discharges of stormwater with fish tissue data. Since the fish tissue data is based on current sources, any source control action would affect that data. Therefore, I believe that monitoring Outfall 003 (WR-24) at OSM will not fulfill this data objective because they are adding a treatment process to that outfall which would eliminate sources that were occurring when the fish tissue data was collected. The data from that outfall, however, should be used for the recontamination analysis for the FS. Performance monitoring by OSM should be able to provide LWG with the data necessary for the FS as long as the data collected is as described in the LWG Stormwater FSP. Consequently, I see four options with getting data for the fish tissue objective from the OSM site: 1) Monitor Outfall 001 (WR-22); 2) Monitor upstream of the new treatment system (if feasible); 3) Take the highest soil sample in the drainage basin and multiply it by their TSS and runoff rates; or 4) skip it all together.

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02/07/2007 10:02 AM  
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Subject  
Harbor RI/FS RE: Portland  
for EPA/LWG Stormwater FSP  
Approval

Stormwater Technical Team -

Amanda Shellenberger discussed the OSM outfalls with OSM folks. Given that both outfalls have some form of treatment and WR-24 appears to have

less treatment, we propose that WR-24 (the one originally designated by the management team) continue to be the one that is sampled at OSM. This is the location that is shown in the FSP that was just sent out. We are continuing with other new site recons. this week including confirmation of St. Johns bridge and Hwy 30 locations and working on finding a spot within OF-18 basin.

Also, FYI that GE is being some what reluctant and we hope to have go ahead from Schnitzer today to do the recon only. They have not yet agreed to give us access for the actual sampling.

Thanks.

Carl

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